

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
ASSUNCAO BROS., INC.,	Case No. 22-16159-CMG
Debtors.	

**NOTICE OF APPEARANCE  
AND REQUEST FOR NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that the attorneys set forth below appear as counsel for Vollers Excavating and Construction, Inc. (“Vollers”), in the above-captioned chapter 11 case and, pursuant to Bankruptcy Rules 2002, 9007, and 9010, the undersigned request that the Clerk of Court enter the following names and addresses on the general matrix for this case, and on all special or limited matrices, and hereby request that copies of all notices, whether given pursuant to Bankruptcy Rule 2002 or otherwise, and all orders and other pleadings and papers in this case be given and sent to the following:

Louis A. Modugno, Esq.  
**TRIF & MODUGNO LLC**  
89 Headquarters Plaza  
North Tower, Suite 1201  
Morristown, New Jersey 07960  
(T) (973) 547-3611  
(F) (973) 554-1220  
lmodugno@tm-firm.com

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any or all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, statements of affairs, operating reports, schedules of assets and liabilities, or other papers, whether formal or informal, written or oral, and whether transmitted or

conveyed by mail, courier service, hand delivery, telephone, facsimile, transmission, telegraph, telex, e-mail, or otherwise, which relate in any way to the above-referenced case or proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance and Request for Notices and Papers (the “Notice”), nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding related to, or triable in, these cases or any case, controversy or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses, setoffs or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: August 4, 2022

**Trif & Modugno LLC**

By: /s/ Louis A. Modugno  
Louis A. Modugno, Esq.  
89 Headquarters Plaza North Tower, Suite 1201  
Morristown, New Jersey 07960  
(T) (973) 547-3611  
(F) (973) 554-1220  
lmodugno@tm-firm.com  
*Attorneys for Vollers Excavating and Contractors,  
Inc.*

**CERTIFICATE OF SERVICE**

I, Louis A. Modugno, hereby certify that on this 4th day of August 2022, I caused the foregoing Notice of Appearance and Request for Notices and Papers filed herewith to be served by this Court's CM/ECF System.

/s/ Louis A. Modugno